

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Washington, D.C.**

BID PROTEST

FMS Investment Corp., *et al.*,

Plaintiffs,

v.

THE UNITED STATES,

Defendant

and

PERFORMANT RECOVERY, INC., *et al.*,

Defendant-Intervenors.

CFC Nos. 18-204C, 18-206C, 18-207C,
18-208C, 18-211C, 18-214C, 18-216C,
18-220C, 18-229C, 18-238C, 18-239C,
18-245C, 18-246C, 18-248C, 18-251C,
18-252C, 18-261C, 18-275C, 18-328C,
18-498C (consolidated)

Judge Thomas C. Wheeler

**PLAINTIFF PIONEER CREDIT RECOVERY, INC.'S NOTICE
REGARDING GOVERNMENT'S MOTION TO DISMISS**

Pursuant to the Court's May 7, 2018 Order (ECF No. 190) requesting the parties file a notice indicating whether or not they plan to oppose the government's motion to dismiss the above-captioned consolidated bid protests (ECF No. 189), Plaintiff Pioneer Credit Recovery, Inc. ("Pioneer"), by and through counsel, states as follows:

Pioneer does not plan to oppose the government's motion to dismiss the protests as moot. Pioneer will, however, request that Pioneer be permitted to remain a party to the protests (as a plaintiff or intervenor) while any protests regarding the procurement remain pending before the Court so that Pioneer's specific interests are represented.

Respectfully submitted,

Date: May 11, 2018

By: /s/ Jonathan D. Shaffer

Jonathan D. Shaffer (jshaffer@smithpachter.com)

SMITH PACHTER MCWHORTER PLC

8000 Towers Crescent Drive, Suite 900

Tysons Corner, Virginia 22182

Tel: (703) 847-6280; Fax: (703) 847-6312

Counsel of Record for Plaintiff

Pioneer Credit Recovery, Inc.

Of Counsel:

Mary Pat Buckenmeyer (mbuckenmeyer@smithpachter.com)

Sean K. Griffin (sgriffin@smithpachter.com)

SMITH PACHTER MCWHORTER PLC

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of May 2018, "PIONEER CREDIT RECOVERY, INC.'S NOTICE REGARDING THE GOVERNMENT'S MOTION TO DISMISS" was electronically filed. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Jonathan D. Shaffer
Jonathan D. Shaffer